

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
PINE BLUFF DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

JUN 02 2014

JAMES W. MCCORMACK, CLERK
By: 

PLAINTIFF

MATTHEW NOLA

V

NO.

5:14cv0209-JM

KNYLEA MILHOLLAND

DEFENDANT

COMPLAINT

Plaintiff, for his complaint, states:

1. Plaintiff is a citizen and resident of Louisiana. *This case assigned to District Judge Murphy*
2. Defendant is a citizen and resident of Arkansas and resides in the Eastern District

of Arkansas.

3. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.00.
4. On June 30, 2012, plaintiff was a passenger in a vehicle driven by the defendant.

Defendant was driving the vehicle in an easterly direction on Hwy 138 in Drew County, Arkansas approximately one mile from the Bayou Bartholomew Bridge when she fell asleep and lost control of the vehicle. The vehicle traveled across the center line of the highway into on coming traffic when the defendant woke up, jerked the steering wheel right to get back into the correct lane of traffic, which caused the car to become airborne and roll over approximately two times.

5. The defendant was negligent in falling asleep while driving, traveling too fast for conditions, failing to keep a proper look out, and otherwise failing to exercise ordinary care.
6. As a proximate result of the negligence of the defendant, plaintiff has incurred

pain and mental anguish and will do so in the future, has scars and disfigurement, and has sustained a permanent injury.

7. Plaintiff demands a trial by jury.

WHEREFORE, plaintiff prays judgment against defendant in an amount in excess of \$75,000.00, for his costs and all other proper relief.

Respectfully submitted,

Timothy O. Dudley, #82055
114 South Pulaski Street
Little Rock, Arkansas 72201
(501) 372-0080
Todudley@swbell.net

BY: 